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5 Attorneys for Plaintiff  
6 RAE SYSTEMS INC.

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO JUDICIAL DISTRICT  
11

12 RAE SYSTEMS INC., a Delaware  
corporation,

13 Plaintiff,

14 v.  
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16 TSA SYSTEMS, LTD., a Colorado  
corporation; GAMMA NEUTRON  
17 PRODUCTS, INC., a Colorado corporation;  
and DOES 1-100, inclusive,

18 Defendants.  
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CASE NO. C 04-02030 SI

JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING CONFIDENTIALITY

1 The Parties, having met and conferred, hereby agree and do stipulate that:  
2 In the absence of further order of this Court, all discovery obtained in this matter shall be used  
3 exclusively for the purposes of litigating the instant matter and shall be kept confidential.  
4 Neither party shall disclose information, including documents and testimony, obtained via  
5 discovery in this matter to any non-party to this lawsuit, without first obtaining the permission of  
6 this Court.

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8 Dated: November 3, 2005

Respectfully submitted,

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11 By: /s/

John P. Flynn  
LATHAM & WATKINS  
Attorneys for Plaintiff  
RAE Systems Inc.

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15 Dated: November 3, 2005

Respectfully submitted,

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18 By: [Signature]

Bruce Nye  
ADAMS NYE SINUNU BRUNI BECHT  
Attorneys for Defendants  
TSA Systems Ltd. and  
Gamma Neutron Products, Inc.



[PROPOSED] ORDER

Upon due consideration of the parties' agreement to maintain confidentiality and in the interests of justice, IT IS HEREBY ORDERED that all discovery obtained in this matter shall be used exclusively for the purposes of litigating the instant matter and shall be kept confidential. It is FURTHER ORDERED that neither party shall disclose information, including documents and testimony, obtained via discovery in this matter to any non-party to this lawsuit, without first obtaining the permission of this Court.

Dated:

By: \_\_\_\_\_

Hon. Susan Illston  
United States District Judge  
for the Northern District of California